

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

|                        |   |                           |
|------------------------|---|---------------------------|
| UNITED STATES, et al., | ) |                           |
|                        | ) |                           |
| Plaintiffs,            | ) |                           |
| v.                     | ) | No. 1:23-cv-00108-LMB-JFA |
|                        | ) |                           |
| GOOGLE LLC,            | ) |                           |
|                        | ) |                           |
| Defendant.             | ) |                           |

**DECLARATION OF CHRISTOPHER KARPENKO**  
**IN SUPPORT OF PLAINTIFFS' RESPONSE TO**  
**GOOGLE'S MOTION TO SEAL**

Christopher Karpenko, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. I am the Executive Director for Brand Marketing at the United States Postal Service ("USPS" or the "Postal Service") and submit this Declaration in support of Plaintiffs' Opposition to Google's Motion for Summary Judgment.
3. Defendant's Exhibit 142, ECF No. 709-10, is a true and correct copy of invoices directing the Postal Service to make payments for monies spent on particular advertising campaigns.
4. Information about the amounts of money spent on advertising by the Postal Service in specific months is highly commercially sensitive, and, if disclosed could enable competitors to better counter the Postal Service's advertising efforts. While these invoices are from 2022, there is sufficient continuity in the Postal Service's advertising strategy that disclosure of these amounts or the specific categories employed by Universal McCann and the

Postal Service would reveal highly sensitive information about the Postal Service's current advertising strategies and be highly detrimental to the interests of the Postal Service.

5. Defendants' Exhibits 62, ECF No. 601-1, and 97, ECF No. 604-4, are excerpts from an expert report detailing the Postal Service's spending on digital advertising and describing its media purchasing methodology. While the amounts are aggregated over a four-year period, there is sufficient spending information to allow the Postal Service's competitors to learn significant information about the Postal Service's spending. This would be highly detrimental to the interests of the Postal Service. Likewise, the detailed descriptions of the Postal Service's purchasing methodology would be highly detrimental to the Postal Service if revealed publicly.

6. The invoices discussed above were made and kept in the ordinary course of USPS's business, and keeping these documents was a regular practice of USPS's business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 12, 2024.

District of Columbia  
Signed and sworn to (or affirmed) before me on  
June 12, 2024 by Chris Karpenko  
Date Name(s) of Individual(s) making statement  
[Signature]  
Signature of Notarial Officer  
Notary for USPS  
Title of Office  
My commission expires: January 1, 2028

Signed: [Signature]  
Christopher Karpenko  
County and State: Washington, D.C.

TERRY-ANN MONIQUE SCOTT  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires January 1, 2028

